

Independent Ethics Board Annual Report

November 2025



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1. Background

In November 2021, the WADA Foundation Board (Board) approved the WADA Code of Ethics¹ (Code of Ethics). In May 2022, it appointed the inaugural members of the <u>Independent Ethics Board</u> (IEB), the body in charge of implementing the Code of Ethics.

Pursuant to Article 2.6 of the Regulations of the WADA IEB and Rules of Procedure (Annex A to the Code of Ethics), the IEB will report periodically on its activities to the WADA President, who will share the reports with the Executive Committee (ExCo) and Board. The Chair provides the following written report to the WADA President, which will be made available to the ExCo and the Board.

2. Composition and Activities

2.1 Composition of the IEB

The members of the inaugural IEB were approved by the WADA Foundation Board in May 2022, following the recommendation of the WADA Nominations Committee. Terms were staggered to support continuity in the work of the IEB and implement a rotation policy.

The term of the following five IEB members were due to end in May 2025:

- 1) Prof. Mette Hartley, Independent Chair;
- 2) The Hon. Mary Ang'awa, Vice-Chair and Independent Member;
- 3) Prof. Pascal Borry, Independent Member:
- 4) Ms Regina LaBelle, Public Authorities nominee; and
- 5) Mr. Marc Theisen, Sport Movement nominee.
- 6)

Whilst all members were eligible for reappointment, Prof. Mette Hartlev, independent Chair, and Ms. Regina LaBelle, nominee of the Public Authorities, informed the IEB that they would not seek reappointment.

On 19 May 2025, the Foundation Board approved the recommendation of WADA's Nominations Committee to appoint Prof. Pascal Borry as IEB Chair until the end of his renewed term. The Board also approved the appointment of two new members, in replacement of Prof. Hartlev and Ms. LaBelle, and the reappointments of Hon. Ang'awa and Mr. Theisen.

The current composition of the IEB is as follows:

Name	Position	Country	Term End
BORRY, Pascal	Chair, Independent member	Belgium	May 2028
ANG'AWA, Mary	Vice-Chair, Independent member	Kenya	May 2028
HAYAKAWA, Yoshihisa*	Public Authorities nominee	Japan	May 2028
HUTCHINSON, Phil	Independent member	UK	May 2026
JOHNSON, Emma	Independent member	Australia	May 2027
PREZELJ, Rožle	Independent member	Slovenia	May 2027

¹ The Code of Ethics was amended by the Foundation Board in November 2023 and December 2024.



Name	Position	Country	Term End
THEISEN, Marc	Olympic Movement nominee	Luxembourg	May 2028
TUIKETEI, Ana	Independent member	Fiji	May 2026
WESTON, Louis*	Independent member	UK	May 2028

^{*}New Member appointed in May 2025.

The terms of two independent members, Mr. Phil Hutchinson and Ms. Ana Tuiketei, will end in May 2026. A decision on their reappointment for a further term of three years (to take effect in May 2026) is tabled for the Foundation Board's meeting on 5 December 2025.

2.2 Meetings

The IEB has held one meeting per month, for a total of 11 meetings² since its last report to the WADA President in December 2024. All meetings were held virtually. While recognizing the need to minimize travels and expenses, the IEB believes that it is important to meet in person in the future to foster constructive discussions that may be difficult to achieve during virtual meetings, given international time zones of the IEB members. The IEB is grateful that an in-person meeting is currently being planned for 2026.

2.3 Activities

Since the last report in December 2024, the IEB looked at the following matters:

- In February 2025, the IEB adopted its Annual Plan, which established the following priorities:
 - Mapping out and improving the process plan and responsibilities for the entire complaints management process, including the intersection between the different actors involved in the process:
 - Further improving the framework for the investigation of complaints and panel adjudication;
 - Implement an administrative system to monitor and document confidential proceedings involving the IEB;
 - Ensuring awareness among WADA officials of the Code of Ethics and the Ethics Reporting Platform: and
 - Developing and adopting a Stakeholder Management Plan.
- The IEB Panel rendered its final decision in the first case adjudicated by the IEB. The IEB Panel, with support from WADA Legal and external counsel, carefully considered whether to publish that decision, and in the affirmative, under what parameters. A summary of the panel decision can be found on the IEB website.
- The IEB nominated Ms Ana Tuiketei as Election Scrutineer for the election of the WADA President that was launched in March 2025. Ms. Tuiketei oversaw the promotion of candidatures and the voting process, which took place via an online tool during a virtual Board meeting on 29 May 2025. Ms. Tuiketei did not receive complaints related to the Rules of Conduct for candidates and certified the integrity of the voting process.
- The IEB nominated Mr. Phil Hutchinson as Election Scrutineer for the elections for the WADA National Anti-Doping Organizations (NADO) Expert Advisory Group (NADO EAG). Mr. Hutchinson reviewed the eligibility of candidates to sit on the NADO EAG and of NADOs to vote during the

² The IEB is scheduled to meet on 17 December 2025.



election, which occurred from 28 to 31 October 2025 via an online voting tool. Mr. Hutchinson did not receive complaints related to the Rules of Conduct for candidates and certified the integrity of the voting process.

- The IEB, with the support of WADA, implemented an independent SharePoint site as a new document sharing and storage system for materials related to cases.
- The IEB and the Ethics Officer are also working on a document to provide better guidance for the
 Ethics Officer to handle anonymous complaints or when a complainant does not respond to a request
 for consent to transfer their complaint to a third party.

3. Code of Ethics Complaints Update

The Ethics Officer continuously monitors the <u>WADA Ethics Reporting Platform</u> which is managed independently from the IEB. Anyone who has witnessed, knows of, or has reasonable grounds for suspecting ethical misconduct by a WADA Official can submit a report <u>here</u> on the WADA Ethics Reporting Platform. One can also submit a report by email or ask questions to the Ethics Officer at <u>Ethics.Officer@wada-ama.org</u>.

The Ethics Officer, Mr Gautier Aubert, provides reports of his activities to the IEB on a regular basis. He is doing this on a high level without disclosing any confidential details on the complaint, the complainant or the person concerned where the case may be.

In 2025, the Ethics Officer has seen an increasing number of reports (understood as any message that the Ethics Officer receives, either via email or via the Ethics Reporting Platform).

While in 2024, the Ethics Officer received 11 reports, in 2025 (until as at 31 October 2025) this number has increased to 59 reports. The Ethics Officer makes a preliminary review of the report (validity, reliability, and accuracy). After this preliminary review, some reports are immediately closed as they can be classified without any reasonable doubt as spam (four in 2024, 10 in 2025) or unsubstantiated angry messages on developments in the anti-doping community (none in 2024, seven in 2025).

In 2025, the Ethics Officer saw an increasing number of reports that after a first analysis are not meant for the IEB, but for the Intelligence and Investigations Impact Area of WADA (none in 2024, 24 in 2025). The Ethics Officer either refers the complainant to the Speak Up platform or transfers such messages directly to the Intelligence and Investigation Unit.

For all other reports, the Ethics Officer further analyzes the jurisdiction of the IEB. This includes firstly an analysis whether the person(s) concerned is a WADA Official, and whether they are a WADA Staff member or not. If it follows clearly from the complaint, that it concerns a member of the WADA staff, the Ethics Officer informs the complainant of the lack of jurisdiction and directs them to the Staff Ombudsperson (three in 2024, two in 2025). In other cases where the IEB does not have jurisdiction (four in 2024, 10 in 2025), the Ethics Officer also informs the complainant of the lack of jurisdiction. In those cases, the Ethics Officer provides a summary report to the IEB in order to inform the IEB of his activities. For 2025, the analysis of jurisdiction in six cases is still ongoing.

If the IEB's jurisdiction is confirmed, the Ethics Officer will further undertake an investigation, and collect evidence, plan interviews, hold hearings, etc.



When the investigation is completed, the Ethics Officer assesses whether there is a likelihood of a breach of the Code of Ethics or its implementing provisions and provides a written report, which includes an assessment of the jurisdiction, all elements of the investigation and the conclusions regarding likelihood of a breach of the Code of Ethics. This investigation report is submitted to the IEB for further adjudication. As reported above, the IEB adjudicated its first case that was initiated in 2023, but no further cases were adjudicated in 2024 or 2025.

The comparative data for 2024 and 2025 is broken down below.

	Reports (2024)	Reports (2025)
Spam	4	10
Angry Messages	0	7
Analysis of Jurisdiction – Intelligence and Investigations	0	24
Analysis of Jurisdiction – WADA Staff	3	2
Analysis of Jurisdiction – Other	4	10
Analysis of Jurisdiction Ongoing	0	6
Investigation Reports Opened at the IEB	0	0
Matters Closed	11/11	53/59
Total	11	59

4. WADA Code of Ethics Review

The <u>Code of Ethics</u> provides that the IEB shall examine once a year the Fundamental Principles of Section 3 to determine whether they should be amended and report the results of its examination to the Foundation Board (see Section 7 of the Code of Ethics). The Foundation Board last approved amendment to the Code of Ethics on 5 December 2024.

The IEB is of a view that there are no significant substantive changes necessary at this moment. Nevertheless, the IEB is working on a few improvements to the Code of Ethics. The IEB is of the view that the language, format and structure of some provisions, could be improved to enhance clarity. In addition, the IEB would like to further clarify procedures regarding anonymous complaints and the potential procedures and/or transfer (e.g. to Intelligence and Investigations) in the absence of response or consent.

5. Education and Communications Update

The IEB believes that fostering a culture of ethics throughout the organization requires ongoing education and prominent visibility of the Code of Ethics. As previously reported, the IEB supported work to develop a short interactive module that WADA Officials have been invited to complete this year and upon appointment for the following years.

The IEB is pleased to report that the module which was launched in January and members of WADA governance bodies were invited to complete it at the beginning of the year. As at 1 November 2025, 18 WADA Officials had completed the course. Further actions are necessary to increase awareness to this e-learning course and the IEB will work with WADA Management to support an increase in 2026.